

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NUMBER:</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>AN-TSO SUN,</b> <b>a/k/a "Edward Sun"</b>	<b>:</b>	<b>VIOLATION:</b> <b>18 U.S.C. § 922(g)(5)(b) (alien in</b> <b>possession of ammunition – 1 count)</b> <b>Notice of forfeiture</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. At all times relevant to this information, defendant AN-TSO SUN was a Taiwanese national who had been admitted to the United States on or about August 26, 2017 on an F-1 student visa (that is, a nonimmigrant visa) to attend a high school in Upper Darby, Pennsylvania ("School A"). Defendant SUN resided with a host-family in Upper Darby, Pennsylvania.
2. Beginning in or about October 2017, defendant AN-TSO SUN purchased ammunition and visited a Philadelphia shooting range (the "Shooting Range") on multiple occasions.
  - a. On or about October 21, 2017, defendant SUN visited the Shooting Range, where he took a firearms safety lesson and purchased one box of 9mm ammunition.

- b. On or about December 23, 2017, defendant SUN purchased the following ammunition from an online vendor and directed that it be shipped to his host-family address:
  - i. One tin of TulAmmo 7.62x39mm ammunition, containing 640 rounds;
  - ii. One box of IMI 5.56x45mm ammunition, containing 450 rounds; and
  - iii. One box of Blazer Brass 9mm ammunition, containing 50 rounds.
- c. On or about December 31, 2017, defendant SUN visited the Shooting Range with visitors from Taiwan. Defendant SUN paid a fee to use various firearms.
- d. On or about January 2, 2018, defendant SUN visited the Shooting Range with a visitor from Taiwan, where he rented and fired the following firearms:
  - i. A Kriss, model Vector CRB/SO, .45 ACP semiautomatic rifle;
  - ii. A Smith & Wesson, model M&P15 Sport, .223 Remington semiautomatic rifle; and
  - iii. A Mossberg, model 500, 12-gauge shotgun.
- e. While visiting the Shooting Range on January 2, 2018, defendant SUN purchased the following ammunition from the Shooting Range:
  - i. One box of 45 ACP ammunition; and
  - ii. One box of 12-gauge ammunition.
- f. On or about January 6, 2018, defendant SUN purchased the following items from an online vendor and directed that they be shipped to his host-family address:
  - i. Two AR-15 30-round magazines;

- ii. Two Glock 15-round magazines; and
- iii. One box of 12-gauge ammunition containing 25 rounds.

g. On or about January 27, 2018, defendant SUN visited the Shooting Range, where he rented and fired a Zastava, model NPAP M70, 7.62x39mm semiautomatic rifle.

3. From on or about January 7, 2018, through on or about January 9, 2018, defendant AN-TSO SUN purchased the components to manufacture a pistol (including a Glock 19 slide and barrel bearing serial number BESE280, a Polymer80 brand 80% receiver bearing no serial number, and other necessary parts) from multiple online vendors and directed that they be shipped to his host-family address. Thereafter, on a date prior to March 27, 2018, defendant SUN assembled or caused to be assembled these components to create an operable semiautomatic pistol.

4. On or about March 26, 2018, after the school bell rang at the end of the day, defendant AN-TSO SUN made the following statement to another student at School A (“Student 1”): “Hey, don’t come to school on May 1st ... I’m going to come here armed and shoot up the school. Just kidding.” Student 1 reported the incident to school officials, who then alerted law enforcement officials.

5. The following day, on or about March 27, 2018, approximately 1,607 rounds of ammunition, a homemade pistol, and various firearm accessories were found in the bedroom where defendant AN-TSO SUN was staying.

6. On or about March 27, 2018, in Lansdowne, in the Eastern District of Pennsylvania, defendant

**AN-TSO SUN,  
a/k/a "Edward Sun,"**

while being an alien admitted to the United States under a non-immigrant visa, knowingly possessed in and affecting interstate commerce approximately 1,607 rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(5)(B).

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

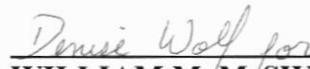
As a result of the violation of possession of ammunition by alien with nonimmigrant visa, in violation of Title 18, United States Code, Section 922(g)(5)(B), set forth in this information, defendant

**AN-TSO SUN,  
a/k/a "Edward Sun,"**

shall forfeit to the United States of America all ammunition and firearms involved in the commission of this offense, including, but not limited to:

- (1) 20 rounds of 9mm Blazer Brass ammunition;
- (2) 44 rounds of 9mm Aguila ammunition;
- (3) 615 rounds of 9mm Blazer Brass ammunition;
- (4) 225 rounds of 12 gauge Federal shotgun ammunition;
- (5) 280 rounds of 5.56mm IMI Systems ammunition; and
- (6) 423 rounds of 7.62 x 39mm TulAmmo ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

  
**WILLIAM M. McSWAIN**  
**UNITED STATES ATTORNEY**